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*Attorneys for Plaintiff  
Overhead Door Corporation*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

OVERHEAD DOOR CORPORATION, an  
Indiana corporation,

Plaintiff,

vs.

JARRAD PRIDA, an individual; TSC, INC.  
d/b/a Torsion Supply Company, a Nevada  
corporation,

Defendants.

Case No.: 3:22-cv-00102-MMD-CLB

**STIPULATION AND ORDER TO  
EXTEND BRIEFING DEADLINES  
REGARDING PLAINTIFF'S MOTION  
FOR PRELIMINARY INJUNCTION  
(ECF NO. 4)**

**(First Request)**

Plaintiff Overhead Door Corporation ("Plaintiff" or "ODC"), by and through its counsel Jackson Lewis P.C., and Defendants Jarrad Prida ("Prida") and TSC. Inc. d/b/a Torsion Supply Company ("TSC") (together, "Defendants"), by and through their counsel Robison, Sharp, Sullivan & Brust, hereby stipulate and agree as follows:

**A. Background**

1. On February 22, 2022, Plaintiff filed a Complaint and Request for Injunctive Relief (ECF No. 1) alleging claims for: (i) trade secret misappropriation under the Defend Trade Secrets Act, 18 U.S.C. § 1831 et seq. against Defendants; (ii) trade secret misappropriation under the Nevada Uniform Trade Secrets Act, NRS § 600A.010 et seq. against Defendants; (iii) breach of contract against Defendant Prida; (iv) breach of the covenant of good faith and fair dealing against Defendant Prida; (v) breach of the fiduciary duty of loyalty against Defendant Prida; (vi) unjust enrichment against Defendants; and (vii) tortious/intentional interference with contractual relationships against Defendant TSC.

1           2.       Additionally, on February 22, 2022, Plaintiff filed a Motion for Temporary  
2 Restraining Order (ECF No. 3) and Motion for Preliminary Injunction (ECF No. 4).

3           3.       On February 23, 2022, Plaintiff filed a Motion to Conduct Early, Expedited  
4 Discovery in support of its Motion for Preliminary Injunction (ECF No. 8), and Motion to Establish  
5 Expedited Briefing Schedule and Decision of the Motion (ECF No. 9).

6           4.       Subsequently, the Court issued an order on February 23, 2022 directing that  
7 Defendants would have up to 10 days from service of Plaintiff's Motion for Temporary Restraining  
8 Order to file a response and that Plaintiff would have up to 5 days thereafter to file a reply. ECF  
9 No. 10.

10          5.       Plaintiff served Defendants with the Court's Order (ECF No. 10) and Motion for  
11 Temporary Restraining Order on February 23, 2022. ECF No. 11.

12          6.       Defendants were served pursuant to FRCP 4 with the Summons and Complaint, and  
13 other filings, on February 27, 2022. ECF No. 16.

14          7.       Counsel for Defendants entered a Notice of Appearance on March 1, 2022. ECF  
15 Nos. 14 and 15.

16          8.       On March 4, 2022, the Parties entered into a stipulation extending the time for  
17 Defendants to file their response to Plaintiff's Motion for Temporary Restraining Order to March  
18 14, 2022, and for Plaintiff to file its reply in support to five (5) days thereafter. ECF No. 17. The  
19 Court granted the stipulation the same day. ECF No. 18.

20          9.       On March 8, 2022, Defendants filed their Answer to Plaintiff's Complaint. ECF No.  
21 19.

22          10.       In furtherance of their efforts to resolve the case expeditiously, the Parties entered  
23 into a stipulation: (1) impose a Temporary Restraining Order against Defendants; (2) establish  
24 briefing deadlines regarding Plaintiff's Motion for Preliminary Injunction (ECF No. 4); (3)  
25 establish an early, expedited discovery plan; and (4) acknowledge that Plaintiff's Motion to  
26 Establish Expedited Briefing Schedule and Decision of Plaintiff's Motion to Conduct Early,  
27 Expedited Discovery (ECF No. 9) was moot. *See* ECF Nos. 21-24. The Court granted such  
28 stipulations on March 31, 2022. ECF Nos. 26-29.

1           11. As part of the stipulations, the parties agreed to the following briefing schedule  
2 regarding Plaintiff's Motion for Preliminary Injunction (ECF No. 4):

- 3           a. Plaintiff shall file any supplement to its Motion for Preliminary Injunction by  
4 April 25, 2022.
- 5           b. Defendants' respective responses to Plaintiff's Motion for Preliminary  
6 Injunction (and any supplement thereto), if any, shall be due by May 5, 2022.
- 7           c. Plaintiff's reply in support of its Motion for Preliminary Injunction (and any  
8 supplement thereto), if any, shall be due on May 18, 2022.
- 9 (the "Briefing Schedule") ECF No. 22.

10           12. The Parties are continuing to engage in discussions to expeditiously resolve this case  
11 and do not wish to impose additional filings on the Court and its resources when such filings may  
12 be rendered unnecessary by settlement. Therefore, good cause exists to extend the Briefing  
13 Schedule deadlines by thirty (30) days as follows:

- 14           a. Plaintiff shall file any supplement to its Motion for Preliminary Injunction by  
15 May 25, 2022.
- 16           b. Defendants' respective responses to Plaintiff's Motion for Preliminary  
17 Injunction (and any supplement thereto), if any, shall be due by June 6, 2022.
- 18           c. Plaintiff's reply in support of its Motion for Preliminary Injunction (and any  
19 supplement thereto), if any, shall be due on June 17, 2022.

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13. This is the first request to extend the Briefing Schedule deadlines.

14. This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 25th day of April, 2022.

JACKSON LEWIS P.C.

ROBISON, SHARP, SULLIVAN & BRUST

/s/ Joshua A. Sliker

/s/ Michael E. Sullivan

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**ORDER**

IT IS SO ORDERED:



United States District Court Judge

Dated: April 26, 2022